

LITE DEPALMA GREENBERG & AFANADOR, LLC

Joseph J. DePalma
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: (973) 623-3000
jdepalma@litedepalma.com

Counsel for Plaintiff Ira Polly

[Additional counsel listed below]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: APPLE INC. SMARTPHONE
ANTITRUST LITIGATION

*This Document Relates to:
All Direct Purchaser Plaintiff Actions*

Case No. 24-MD-3113 (JXN-LDW)

**NOTICE OF MOTION TO
APPOINT INTERIM CO-LEAD
CLASS COUNSEL
FOR DIRECT PURCHASER
PLAINTIFFS**

PLEASE TAKE NOTICE that on September 3, 2024, at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiff Shoshi Goldfus in *Goldfus v. Apple Inc.*, Case No. 2:24-cv-04108 (JXN-LDW) (D.N.J.), and Plaintiff Ira Polly in *Polly v. Apple Inc.*, Case No. 2:24-cv-07849 (JXN-LDW) (D.N.J.), individually and on behalf of all others similarly situated (collectively “Plaintiffs”), will move before the Honorable Julien X. Neals U.S.D.J. at the United States District Court for the District

of New Jersey, Martin Luther King Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for an order appointing Interim Co-Lead Counsel for Plaintiffs, approving Interim Co-Lead Counsel for Plaintiffs pursuant to Fed. R. Civ. P. 23(g)(3), and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely on the accompanying Memorandum of Law and Declaration of Joseph J. DePalma. A proposed form of Order is also submitted herewith.

Respectfully submitted,

**LITE DEPALMA GREENBERG
& AFANADOR, LLC**

Dated: August 8, 2024

/s/ Joseph J. DePalma

Joseph J. DePalma
570 Broad Street, Suite 1201
Newark, NJ 07102
Tel: (973) 623-3000
jdepalma@litedepalma.com

**LITE DEPALMA GREENBERG
& AFANADOR, LLC**
Mindee J. Reuben
Steven J. Greenfogel*
1515 Market Street, Suite 1200
Philadelphia, PA 19102
Tel: (215) 854-4060
mreuben@litedepalma.com
sgreenfogel@litedepalma.com

*Counsel for Plaintiff Ira Polly and the
Putative Class*

HAUSFELD LLP

Michael D. Hausfeld*
Melinda R. Coolidge*
Sarah R. LaFreniere*
Nicholas Murphy*
Theodore DiSalvo*
881 16th Street, NW Suite 300
Washington, DC 20006
Tel: (202) 540-7200
mhausfeld@hausfeld.com
mcoolidge@hausfeld.com
slafreniere@hausfeld.com
nmurphy@hausfeld.com
tdisalvo@hausfeld.com

Katie R. Beran
325 Chestnut Street, Suite 900
Philadelphia, PA 19106
Tel: (215) 985-3270
kberan@hausfeld.com

Scott Martin*
Daniel P. Weick*
33 Whitehall Street, 14th Floor
New York, NY 10004
Tel: (646) 357-1100
smartin@hausfeld.com
dweick@hausfeld.com

Michael P. Lehman*
Megan E. Jones*
600 Montgomery Street, Suite 3200
San Francisco, CA 94111
Tel: (415) 633-1908
mlehman@hausfeld.com
mjones@hausfeld.com

*Counsel for Plaintiffs Goldfus and Polly and
their respective Putative Classes*

SUSMAN GODFREY LLP

William Christopher Carmody**

Shawn J. Rabin**

Cory Buland**

Mark Musico**

Elisha Barron**

One Manhattan West, 50th Floor

New York, NY 10001-8602

Tel: (212) 336-8330

bcarmody@susmangodfrey.com

srabin@susmangodfrey.com

cbuland@susmangodfrey.com

mmusico@susmangodfrey.com

ebarron@susmangodfrey.com

Counsel for Plaintiff Polly and the Putative Class

CRITCHLEY, KINUM & LURIA, LLC

Michael Critchley

75 Livingston Avenue

Roseland, New Jersey 07068

Tel: (973) 422-9200

mcritchley@critchleylaw.com

Counsel for Plaintiff Goldfus and the Putative Class

* admitted *pro hac vice*

***pro hac vice* forthcoming